

Exhibit



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
Natural Resources Conservation Council

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Hazardous Materials Management Division
103 South Main Street / West Building
Waterbury, VT 05671-0404
802-244-8702

July 23, 1992

Joel Cherington
C & S Wholesale Grocers, Inc.
Old Ferry Road
Brattleboro, Vt 05301

Re: Petroleum contamination at C & S Wholesale Grocers, Inc. in Brattleboro, Vermont.
(Site # 92-1258)

Dear Mr. Cherington:

The Sites Management Section (SMS) has received a report outlining the subsurface assessment for the above referenced site performed by Richard S. DeWolfe, P.E. on June 24, 1992. A preliminary contamination assessment was submitted to Mr. DeWolfe on June 3, 1992 by the Professional Service Industries. This assessment summarizes the gross extent of residual petroleum contamination to the soils in the vicinity of the three (3) 10,000 gallon gasoline underground storage tanks (USTs) removed to the south of the main warehouse and freezer. An oil interceptor and 1000 gallon oil UST were also excavated from the trailer maintenance area onsite; soils surrounding the associated dry well were analyzed for volatile organic compounds (VOCs).

Toluene and xylene were present in soil samples south of the USTs at levels well above concentration guidelines set by the State of Vermont. The presence of petroleum hydrocarbons in the vicinity of these tanks were confirmed in laboratory testings. Field screenings at the trailer maintenance area conclusively identified petroleum contamination in close proximity to the dry well; little lateral penetration was apparent. Upon visual investigation, free product was noticed in the dry well; petroleum odors were also observed. According to Mr. DeWolfe, 3,850 cubic yards of contaminated soils were removed and stockpiled on an offsite location.

Of major concern to the SMS is the realization of any potential human or environmental receptors which may be adversely effected by this hazardous material release. C & S Wholesale Grocers, Inc. is an active business situated in a light commercial industrial area. Hydrocarbon vapor impacts to surrounding businesses in the nearby area is a concern.

Groundwater was determined to be at an approximate depth of over 70 feet below ground surface. An onsite private bedrock well is located to the north of the site, owned and operated by C & S Wholesale Grocers, Inc. George Moore and Sons Builders owns a drinking supply well located approximately 1000 feet to the west of the site. Both wells may be at risk of contamination from the petroleum release at this site. The surface water of the Connecticut River may also be endangered.

The SMS therefore requests that C & S Wholesale Grocers, Inc. engage in the services of a qualified consultant to conduct additional analysis onsite.

Following is an outline of the work requested:

- 1.) Develop and implement a treatment and disposal plan for the 3850 cubic yards of stockpiled soils. This may include offsite treatment by polyencapsulation or out-of-state asphalt batching.
- 2.) Determine the risk the contamination poses to adjacent receptors. Special attention should be paid to vapor concentrations in the foundations of neighboring businesses. Nearby private drinking wells and surface water of the Connecticut River must be investigated.
- 3.) Determine the need to develop a remedial treatment plan and long-term monitoring plan for the site. This should be based upon the results of the above requests; and may include passive and/or active remediation.
- 4.) Submit a summary report providing a complete site map, the results of the surface and/or groundwater investigation and any conclusions or recommendations which can be reached.

Please have your consultant submit a preliminary work plan which details the above requests. This work must be submitted to the SMS within fifteen (15) days of the receipt of this letter.

The tank pull was covered under the state Petroleum Cleanup Fund. Therefore all approved work will be reimbursed through the fund, once the C & C Wholesale Grocers, Inc.'s \$10,000 deductible has been met. Please review the enclosed Reimbursement Policy, which outlines the expenditures which are covered.

Sincerely,



Charles B. Schwer, Supervisor
Sites Management Section

cc:Brattleboro Selectboard